

CRIMINAL COURT OF THE CITY OF NEW YORK  
COUNTY OF QUEENS

**Additional Supporting Deposition**

THE PEOPLE OF THE STATE OF NEW YORK

-against-

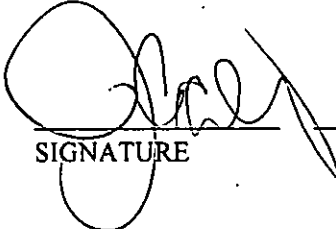
VIDYARTIE GANESH

Q19616119

I, Jessica Coalter, depose and say I am employed by the Queens District Attorney's Office and affirm the following statements to be true under penalties of perjury:

- (1) On or about 5/14/2019 I spoke to DARA MCCANTS in the above entitled action, and she/he agreed to sign the supporting deposition electronically.
- (2) In addition the attached e-mails were sent from my office e-mail account to the complainant's e-mail account.
- (3) The attached e-mails are a complete and accurate copy of the e-mails I sent to the complainant in the above entitled action and the complainant's response.
- (4) After I received the attached e-mail exchange, I called the complainant and confirmed that he/she typed the attached response.

False statements made herein are punishable  
as a class "A" misdemeanor pursuant to  
section 210.45 of the Penal Law

  
SIGNATURE

5-16-19  
DATE

CRIMINAL COURT OF THE CITY OF NEW YORK  
COUNTY OF QUEENS

**Supporting Deposition**

THE PEOPLE OF THE STATE OF NEW YORK

-against-

VIDYARTIE GANESH

Q19616119

I, DARA MCCANTS

depone and say that I am the person mentioned in the accusatory instrument filed in the above entitled action and that I have read the above accusatory instrument in this action. Further, the facts stated in that instrument to be on information furnished by me are true upon my personal knowledge. Further I understand that an electronic signature has the same legal effect as my signature affixed by hand. I further understand that by typing the words "I agree" along with my name in a reply email, the office of the District Attorney is authorized to affix my electronic signature to this affidavit.

False statements made herein and made in this document are punishable as a class "A" misdemeanor pursuant to section 210.45 of the penal law .

**DARA MCCANTS** Dated: 5/16/2019

\*The above is an "electronic" signature that has been authorized by the above name person pursuant to New York's Electronic Signature and Records Act and New York State's Technology Law Section 301-3009 (2002)

Jessica Coalter - Re: Deposition for your Review

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From: [REDACTED]  
To: JECoalter@queensda.org  
Date: 5/16/2019 11:32 AM  
Subject: Re: Deposition for your Review

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\*\*\* External email: Use caution with links and attachments. \*\*\*

I Agree  
Dara McCants  
5/15/2019

Sent from Yahoo Mail for iPhone

On Tuesday, May 14, 2019, 7:08 PM, QCDAEmail@QueensDA.org wrote:

Dear DARA MCCANTS:

Hello my name is ADA Jessica Coalter. This email is to confirm our earlier conversation that you have agreed to sign the supporting deposition electronically. Below is a copy of the accusatory instrument that has been drafted in connection with the case. Your supporting deposition is currently unsigned. Please read the entire complaint below (SECTION I) and also review the supporting deposition at the end of this email in SECTION II. If the information is true and accurate and you still agree to sign your supporting deposition electronically, please reply to this email and simply type "I agree" and then your name. For example, "I agree Jane Smith".

By clicking on the reply button and TYPING "I AGREE" AND YOUR NAME, the supporting deposition will be considered electronically signed by you and we will place an electronic signature on the supporting deposition. By typing "I agree" and your name you are confirming the statements in the complaint under the penalty of perjury. Replying and signing electronically will have the same force and effect as a hand written signature. Please note that the reply address should be indicated as [JECoalter@queensda.org](mailto:JECoalter@queensda.org). If it isn't please change the address to that.

You will receive a copy of the complaint, along with the electronically signed supporting deposition in a return email.

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Section I

Q19616119  
CRIMINAL COURT OF THE CITY OF NEW YORK  
PART APAR, COUNTY OF QUEENS

THE PEOPLE OF THE STATE OF NEW YORK, COUNTY OF QUEENS

v.

VIDYARTIE GANESH (55Y)

14648839M

DEFENDANT

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POLICE OFFICER WILLIAM CLEMENS OF 113TH PRECINCT, TAX REG#: 944033, BEING DULY SWORN, DEPOSES AND SAYS THAT ON OR ABOUT APRIL 27 2019 AT ABOUT 7:06PM, AT THE INTERSECTION OF MATHEWSON COURT AND BELKNAP AVENUE, COUNTY OF QUEENS, STATE OF NEW YORK, THE DEFENDANT COMMITTED THE OFFENSES OF:

PL 245.00 (EFF. 11-1-15) [BM] PUBLIC LEWDNESS - (DNA SAMPLE REQUIRED UPON CONVICTION)

PL 245.01 [V] EXPOSURE OF A PERSON

---

PL 245.00 (EFF. 11-1-15) [BM] PUBLIC LEWDNESS - (DNA SAMPLE REQUIRED UPON CONVICTION)

--- INTENTIONALLY EXPOSE THE PRIVATE OR INTIMATE PARTS OF HIS OR HER BODY IN A LEWD MANNER OR COMMITTED ANY OTHER LEWD ACT: (A) IN A PUBLIC PLACE, OR (B)(I) IN PRIVATE PREMISES UNDER CIRCUMSTANCES IN WHICH HE OR SHE MAY READILY BE OBSERVED FROM EITHER A PUBLIC PLACE OR FROM OTHER PRIVATE PREMISES, AND WITH INTENT THAT HE OR SHE BE SO OBSERVED, OR (II) WHILE TRESPASSING, AS DEFINED IN SECTION 140.05 OF THIS PART, IN A DWELLING AS DEFINED IN SUBDIVISION THREE OF SECTION 140.00 OF THIS PART, UNDER CIRCUMSTANCES IN WHICH HE OR SHE IS OBSERVED BY A LAWFUL OCCUPANT;

PL 245.01 [V] EXPOSURE OF A PERSON

--- APPEAR IN A PUBLIC PLACE IN SUCH A MANNER THAT THE PRIVATE OR INTIMATE PARTS OF HIS BODY WERE UNCLOTHED OR EXPOSED AND SAID PERSON WAS NOT BREASTFEEDING AN INFANT OR PERFORMING IN A PLAY, EXHIBITION, SHOW OR ENTERTAINMENT.

THE ABOVE OFFENSES WERE COMMITTED AS FOLLOWS:

DEPONENT STATES THAT HE IS INFORMED BY THE EYEWITNESS, DARA MCCANTS, THAT AT THE ABOVE MENTIONED DATE, TIME AND PLACE OF OCCURRENCE, SHE OBSERVED THE DEFENDANT, VIDYARTIE GANESH, EXPOSE HIS NAKED PENIS AND MANIPULATE IT IN A PUBLIC PLACE, OPEN TO PUBLIC VIEW.

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Section II

CRIMINAL COURT OF THE CITY OF NEW YORK  
COUNTY OF QUEENS

Supporting Deposition

THE PEOPLE OF THE STATE OF NEW YORK

-against-

VIDYARTIE GANESH Q19616119

I, DARA MCCANTS

depose and say that I am the person mentioned in the accusatory instrument filed in the above entitled action and that I have read the above accusatory instrument in this action. Further, the facts stated in that instrument to be on information furnished by me are true upon my personal knowledge. Further I understand that an electronic signature has the same legal effect as my signature affixed by hand. I further understand that by typing the words "I agree" along with my name in a reply email, the office of the District Attorney is authorized to affix my electronic signature to this affidavit.

False statements made herein and made in this document are punishable as a class "A" misdemeanor pursuant to section 210.45 of the penal law .

\_\_\_\_\_\* Dated: \_\_\_\_\_

\*The above signature is an "electronic" signature that has been authorized by the above named person pursuant to New York's Electronic Signature and Records Act and New York State's Technology Law Section 301-3009 (2002)

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